

**DLA PIPER LLP**

Mary C. Dollarhide, *admitted pro hac vice*  
4365 Executive Drive, Suite 1100  
San Diego, CA 82121  
Tel, (858) 677-1429  
Fax (858) 638-5119  
Mary.dollarhide@us.dlapiper.com

**OGLETREE, DEAKINS, NASH, SMOAK, &  
STEWART, PC.**

Molly M. Rezac, Nev. Bar No. 7435  
50 West Liberty Street, Suite 920  
Reno, Nevada 89501  
Tel. (775) 440-2372  
Fax (775) 440-2376  
molly.rezac@ogletreedeakins.com

*Attorneys for Defendant The Venetian Casino Resort, LLC*

**THIERMAN BUCK, LLP**

Mark R. Thierman, Esq., Bar No. 8285  
Joshua D. Buck, Esq., Bar No. 12187  
Leah L. Jones, Esq., Bar No. .13161  
7287 Lakeside Drive  
Reno, Nevada 89511  
Tel. (775) 284-1500  
Fax (775) 703-5027  
josh@thiermanbuck.com  
mark@thiermanbuck.com  
leah@thiermanbuck.com

*Attorneys for Plaintiffs Yousif and Walker*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MUSTAFA YOUSIF and SHARONE WALKER)  
on behalf of themselves and all others similarly )  
situated, )

Plaintiffs, )

v. )

THE VENETIAN CASINO RESORT, LLC; )  
LAS VEGAS SANDS, CORP and DOES 1 )  
through 50, inclusive, )

Defendants. )

CASE NO. 2:16-cv-02941-RFB-NJK

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
BRIEFING SCHEDULE ON  
PLAINTIFFS' MOTION FOR  
PROTECIVE ORDER**

Pursuant to this Court's Order to stay this action pending mediation, the parties hereby submit the following briefing schedule and stipulate to other related dates herein.

As previously reported to the Court, the Parties attended mediation on November 21, 2019, but were unable to reach a settlement agreement on that date. The Parties agreed to attend a second mediation on February 28, 2020. In the meantime, further case assessment was conducted and the second day of mediation was ultimately cancelled. Having met and conferred, the parties now jointly request the following briefing schedule with respect to the Parties' ongoing discovery dispute and Plaintiffs' previously filed motion for protective order:

- **February 21:** Plaintiffs to re-file protective order motion related to opt-in discovery propounded on conditionally certified 216(b) collective.
- **March 20:** Defendant to respond to re-filed motion for protective order.
- **April 3:** Plaintiffs to file reply on motion for protective order.

Resolution of this discovery dispute will dictate the need for additional motion practice in this case and the timing of such motion(s). As a result, the Parties believe that resolution of Plaintiffs' motion for a protective order will provide clarity on future dates so that the Parties will be in a better position to propose additional briefing on those motions. Therefore, the Parties further stipulate that Plaintiffs will withdraw their pending Rule 23 class certification motion and the Parties will submit a joint briefing schedule on any future Rule 23 motion (and other potential motions) no later than 14 days following the Court's final resolution on Plaintiffs' motion for protective order.

This Stipulation is made in good faith and not for the purposes of undue burden or delay.

**IT IS SO STIPULATED:**

Dated this 10<sup>th</sup> day of February, 2020.  
THIERMAN BUCK, LLP

Dated this 10<sup>th</sup> day of February, 2020.  
DLA PIPER LLP

/s/Joshua D. Buck  
Mark R. Thierman, Esq., Bar No. 8285  
Joshua D. Buck, Esq., Bar No. 12187  
Leah L. Jones, Esq., Bar No. .13161  
7287 Lakeside Drive  
Reno, Nevada 89511

/s/Mary C. Dollarhide  
Mary C. Dollarhide, *admitted pro hac vice*  
4365 Executive Drive, Suite 1100  
San Diego, CA 82121  
  
OGLETREE, DEAKINS, NASH, SMOAK, &

STEWART, P.C.

*Attorneys for Plaintiffs*

/s/Molly M. Rezac

Molly M. Rezac, Nev. Bar No. 7435  
50 West Liberty Street, Suite 920  
Reno, Nevada 89501

*Attorneys for Defendant*

**ORDER**

**IT IS HEREBY ORDERED** that the Parties' Stipulation and Briefing Schedule on Plaintiffs' motion for protective order is **GRANTED**.

**IT IS FURTHER ORDERED** that the Parties will submit a Joint Status Report and Proposed Briefing Schedule no later than 14 days following final resolution of Plaintiffs' motion for protective order.

**IT IS SO ORDERED:**

\_\_\_\_\_  
UNITED STATES DISTRICT COURT JUDGE

DATED: \_\_\_\_\_, 2020